

1 Debra L. Spinelli, Esq., Bar No. 9695
2 DLS@pisanellibice.com
3 PISANELLI BICE PLLC
4 400 South 7th Street, Suite 300
5 Las Vegas, Nevada 89101
6 Tel: 702-214-2100
7 Fax: 702-214-2101

8 Gregg LoCascio (pro hac vice admitted)
9 Justin Bova (pro hac vice admitted)
10 KIRKLAND & ELLIS LLP
11 1301 Pennsylvania Avenue, N.W.
12 Washington, D.C. 20004
13 Tel: 202-389-5000
14 Fax: 202-389-5200
15 gregg.locascio@kirkland.com
16 justin.bova@kirkland.com

17 Ryan Kane (pro hac vice admitted)
18 Andrew Walter (pro hac vice admitted)
19 KIRKLAND & ELLIS LLP
20 601 Lexington Avenue
21 New York, New York 10022
22 Tel: 212-446-4800
23 Fax: 212-446-4900
24 ryan.kane@kirkland.com
25 andrew.walter@kirkland.com

26 *Counsel for Plaintiff*
27 *Pacira Pharmaceuticals, Inc.*

28 Karen A. Peterson, Esq.,
1 Nevada State Bar No. 366
2 ALLISON MacKENZIE, LTD.
3 402 North Division Street
4 Carson City, Nevada 89703
5 (775) 687-0202
6 kpeterson@allisonmackenzie.com

7 Daniel S. Leventhal (admitted pro hac vice)
8 Jaime Stark (admitted pro hac vice)
9 NORTON ROSE FULBRIGHT US LLP
10 1301 McKinney, Suite 5100
11 (713) 651-5151
12 daniel.leventhal@nortonrosefulbright.com
13 jaime.stark@nortonrosefulbright.com

14 James S. Renard (admitted pro hac vice)
15 Brandy S. Nolan (admitted pro hac vice)
16 NORTON ROSE FULBRIGHT US LLP
17 2200 Ross Avenue, Suite 3600
18 Dallas, TX 75201-7932
19 (214) 855-8000
20 james.renard@nortonrosefulbright.com
21 brandy.nolan@nortonrosefulbright.com

22 Talbot R. Hansum (admitted pro hac vice)
23 Zachary Wegmann (admitted pro hac vice)
24 NORTON ROSE FULBRIGHT US LLP
25 98 San Jacinto Boulevard, Suite 1100
26 Austin, TX 78701-4255
27 (512) 474-5201
28 talbot.hansum@nortonrosefulbright.com
zachary.wegmann@nortonrosefulbright.com

18 *Attorneys for Defendant*
19 *Research Development Foundation*

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 PACIRA PHARMACEUTICALS, INC.,

23 Plaintiff,

24 v.

25 RESEARCH DEVELOPMENT FOUNDATION,

26 Defendant.

27 CASE NO.: 2:21-cv-02241-CDS-DJA

28 **STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR BRIEFING
ON PLAINTIFF'S MOTION TO COMPEL
DOCUMENT PRODUCTION BY
RESEARCH DEVELOPMENT
FOUNDATION**

(FIRST REQUEST)

1 Plaintiff Pacira Pharmaceuticals, Inc. ("Plaintiff" or "Pacira") and Defendant/Counter-claimant
2 Research Development Foundation ("Defendant/Counter-claimant" or "RDF"), by and through their
3 respective counsel, and subject to this Court's approval, agree to a briefing schedule on Plaintiff's Motion
4 to Compel Document Production by Research Development Foundation (the "Motion") (ECF No. 61).
5 This is the first request to set a briefing schedule on the subject motion.

- 6 1. Plaintiff Pacira filed its Motion on June 17, 2022 (ECF No. 61);
- 7 2. To brief the issues and accommodate certain scheduling issues, including the July 4
8 holiday, the parties have agreed to the following briefing schedule on Plaintiff's
9 Motion:
 - 10 a. Defendant RDF's response to the Motion shall be extended from July 1, 2022
11 to July 6, 2022; and
 - 12 b. Plaintiff Pacira's reply in support of the Motion shall be extended and due on
13 or before July 15, 2022.

14 This Stipulation is made in good faith, with good cause, and not for purposes of unduly
15 delaying discovery or trial.

16 DATED this 29th day of June, 2022.

17 PISANELLI BICE PLLC

18 By: /s/ Debra L. Spinelli
19 Debra L. Spinelli, Esq., Bar No. 9695
20 400 South 7th Street, Suite 30
Las Vegas, Nevada 89101

21 Gregg LoCascio, Esq.
22 Justin Bova, Esq.
KIRKLAND & ELLIS LLP
23 1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

24 Ryan Kane, Esq.
25 Andrew Walter, Esq.
KIRKLAND & ELLIS LLP
601 Lexington Avenue
26 New York, New York 10022

27 Counsel for Plaintiff Pacira
28 Pharmaceuticals, Inc.

DATED this 29th day of June, 2022.

NORTON ROSE FULBRIGHT US LLP

By: /s/ Talbot R. Hansum
Talbot R. Hansum, Esq.
Zachary Wegmann, Esq.
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, TX 78701-4255

Karen A. Peterson, Esq., Bar No. 366
ALLISON MacKENZIE, LTD.
402 North Division Street
Carson City, Nevada 89703

Daniel S. Leventhal, Esq.
Jaime Stark, Esq.
NORTON ROSE FULBRIGHT US LLP
1301 McKinney, Suite 5100

James S. Renard, Esq.
Brandy S. Nolan, Esq.
NORTON ROSE FULBRIGHT US LLP
2200 Ross Avenue, Suite 3600
Dallas, TX 75201-7932

*Attorneys for Defendant Research
Development Foundation*

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, based on the parties' above stipulation, that Defendant shall file its response to Plaintiff's Motion to Compel Document Production on or before July 6, 2022, and Plaintiff shall file its reply on or before July 15, 2022.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: June 30, 2022

CASE NO.: 2:21-CV-02241-RFB-DJA